

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20054

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Federal Communications Commission  
Office of Secretary

In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact Upon the )  
Existing Television Broadcast )  
Service )

MM Docket No. 87-268

To: The Commission

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PETITION FOR RECONSIDERATION  
BY GANNETT CO., INC.

Gannett Co., Inc. (Gannett), by its attorneys,  
hereby seeks reconsideration of the Commission's Sixth  
Report and Order in this proceeding.<sup>1</sup>

Gannett is the controlling owner of 18 television  
stations in 15 states, and therefore has a significant  
interest in the FCC rules adopted for allotment and  
assignment of digital television (DTV) channels. Moreover,  
two of Gannett's stations are in the top 10 television  
markets (Washington, D.C. and Atlanta, GA), and Gannett has  
voluntarily undertaken to meet accelerated DTV construction  
schedules in both of these markets.

As noted below, several Gannett stations may  
suffer material coverage or antenna relocation problems in  
the absence of clarification or reconsideration of the  
Sixth Report.

<sup>1</sup> Sixth Report and Order, MM Docket No. 87-268,  
FCC 97-115, (rel. April 21, 1997).

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List A B C D E

A. Association for Maximum Service Television, Inc.  
Petition for Clarification and Partial  
Reconsideration

Gannett's Broadcast Group is a member of the Association for Maximum Service Television, Inc. (MSTV), and it strongly supports MSTV's Petition for Clarification and Partial Reconsideration of the Fifth and Sixth Reports and Orders to be filed herein (MSTV Petition).

B. Relief for Gannett Stations

The MSTV Petition points out the need to address the matter of closely located first adjacent DTV channels and the uncertain effects on quality of service this type of proximity may create. For example, Gannett's station WUSA-TV in Washington, D.C. will have nearby first adjacent channels on either side of its DTV channel 34, and hence it has a particular concern about this issue. Further clarification from the Commission is respectfully requested if these adjacent channels create possible conflicts.

Similarly, Gannett's station WKYC-TV, Cleveland, OH, employing DTV channel 2, apparently could have an impaired DTV service due to impulse noise; DTV channel 2 and the WKYC-TV NTSC channel 3 could cause interference to one another and to first adjacent channels in the Great Lakes area.

Gannett anticipates that, due to possible antenna tower capacity limits in several of its markets, it will be forced to seek out new DTV antenna sites more than 5 km distant from the current NTSC sites. Accordingly, it seeks

further clarification from the Commission as to the procedures which will permit such moves to be processed and approved without undue delay or difficulty.

C. Channels 2-6 Core Status

Since six of Gannett's stations operate in the channel 2-6 band, and the DTV channel alternatives are far less efficient in terms of coverage, Gannett has a particular interest in MSTV's contention that the FCC should eliminate the transition uncertainty created by postponement of a final determination concerning the core status of these channels. The propagation characteristics of these low band channels assure wide areas of service, which clearly advances the public interest. Conjecture about technical suitability of these channels is an inadequate ground for casting the core status of these channels in limbo for an indefinite period.

In this regard, Gannett also specifically endorses and adopts the arguments affecting the desired treatment of channel 2-6 core status as set forth in the Petition for Reconsideration filed on May 29, 1997 by "Certain Channel 2-6 Licensees." These Licensees point out the practical problems created by leaving the status of channels 2-6 for future resolution. The over 300 stations affected by this postponement face the unwelcome prospect of possibly having to operate after the DTV transition on channels that would be materially unsuitable. FCC irresolution on this issue impairs necessary planning for

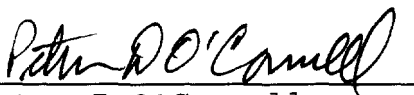
the new DTV service because these licensees, unlike those in other channel bands, must invest cautiously in their DTV facilities which may ultimately have to be abandoned.

D. Minimum Receiver Standards

Gannett believes it is important for the Commission to assure that receivers of DTV transmissions perform effectively at the level on which DTV Allotments/Assignments are predicated. As MSTV has urged, the FCC has authority under the All Channel Receiver Act to require that receivers be manufactured to receive all signals at an acceptable quality. Accordingly, Gannett endorses MSTV's proposal that the Commission exercise this authority, either through a phased-in period of minimum standards, or by calling on manufacturers to provide periodic updates regarding the development of low noise-figure DTV tuners. Such reports would permit the FCC and the public to monitor the need for additional regulatory steps.

Respectfully submitted,

GANNETT CO., INC.

by   
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